

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

AUTONOMOUS DEVICES LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 22-1466-MN
)	
TESLA, INC.,)	
)	
Defendant.)	

MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTES

Autonomous Devices LLC (“Autonomous”) respectfully moves this Court to schedule a teleconference to address outstanding discovery disputes regarding the following matters:

- Discovery regarding predecessor supercomputers (identified in Autonomous’ Paragraph 6(a) disclosures as accused products) in response to Autonomous’ Interrogatories and Requests for Production.
- Production of wiki and training documents to assist in the review of the source code and other Tesla internal technical documents (Autonomous’ Request for Production No. 35).
- Discovery related to the safety of the accused Full Self-Driving and Enhanced Autopilot technology (Autonomous’ Request for Production Nos. 85, 87, 88, 89).
- Tesla Inc.’s response to Autonomous’ Interrogatory No. 10 seeking identification of former employees with supervisory or management roles regarding the accused technology.

- Discovery of agreements related to autonomous driving or training a vehicle for autonomous driving (Autonomous' Interrogatory No. 8 and Requests for Production Nos. 60, 79, 80).

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (in person and/or by telephone) on the following date(s):

First Meet and Confer: June 23, 2023

Second Meet and Confer: July 24, 2023

Delaware Counsel for Plaintiff: Karen E. Keller (second meet and confer)

Delaware Counsel for Defendant: Cameron Clark (first meet and confer), Brian Egan (second meet and confer)

Lead Counsel for Plaintiff: Blair M. Jacobs

Lead Counsel for Defendant: Anish Desai (first meet and confer), Adrian Percer (second meet and confer)

Autonomous is available for a teleconference on August 24 and 25. Tesla Inc. has not responded to requests for dates of availability that were made by Autonomous on three separate occasions this week and last week.

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Dated: August 2, 2023